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Linda McCulloch
Superintendent

September 2008

To: School Food Authority Administrators

From: Christine Emerson, Director
School Nutrition Programs

Re: **Instructions for Verification:** LEAs with **greater than 80%** household response rate in the previous school year

Congratulations! Your school had a greater than 80 percent household response rate to verification last year. This means that your verification requirements will remain the same. Verification is the process by which Local Educational Agencies (LEAs) confirm the eligibility of a sample of approved applications for free and reduced-price meals. The verification process must be completed by **November 15, 2008**, and LEAs must submit the Summary of Verification form to this office by December 15, 2008. It is highly recommended that schools separate applications based on the categories listed on the Summary of Verification form (1.a through 2). Separating the applications as they come in will ease the verification procedure immensely.

The following prototype letters are available at <http://www.opi.mt.gov/schoolfood/index.html> and are required to successfully complete the verification process. If you have trouble downloading any of these forms, please contact our office at (406) 444-2501.

- Notification of Selection for Verification of Eligibility Letter (*front and back*)
- Notification of Results of Verification of Eligibility Letter

Verification does **not** apply to:

- Children in split-session kindergarten programs participating in the Special Milk Program;
- Residential Child Care Institutions, except for applications for attending day students;
- Schools in non-base years using Special Provisions 2;
- Households whose determinations are directly certified as eligible for free meals using Department of Public Health and Human Services letters and food stamp reports;
- Homeless, migrant and/or runaway students identified by the LEAs homeless liaison; and
- Non-applicants approved by local officials (administrative applications).

See the following instructions for verification activities. For more information, use the *Eligibility Guidance for School Meals Manual*:

<http://www.fns.usda.gov/cnd/Governance/notices/iegs/EligibilityManual.pdf>
(starting on page 62) or call School Nutrition Programs at (406) 444-2501.

Enclosures

"It is the mission of the Office of Public Instruction to improve teaching and learning through communication, collaboration, advocacy, and accountability to those we serve." *"It is the mission of the Office of Public Instruction to improve teaching and learning through communication, collaboration, advocacy, and accountability to those we serve."*

Instructions for Verification Activities (Random or Focused Methods)

Beginning of School Year to October 1

Collect and approve applications for free and reduced-price meals.

October 1

Count the number of family **applications** approved for free and reduced-price meals as well as the number of **students** approved on household applications as of **October 1**. *Directly certified, homeless and administrative students are not eligible for verification, but the number of students must be included on the Summary of Verification.* Complete items 1 through 3 on the Summary of Verification form.

1. Choose either the random or focused sampling methods and calculate the number of applications to verify. See “Verification Sample Methods,” below.
2. Draw the required number of applications. ***Do not verify less than or more than 3 percent.***
3. Once the applications have been drawn for verification, a “preliminary review” must be conducted. A person other than the determining official must check the applications pulled for verification to ensure that they were determined correctly before the verification process can proceed.
4. Send the prototype notification of selection for verification letters to the selected household(s). This letter is available at <http://www.opi.mt.gov/schoolfood/index.html>.
 - The household should have ten working days to submit income documentation.
 - The household may provide proof that the child is a member of a household receiving assistance under the Food Stamp Program, TANF or FDPIR instead of providing income information and social security numbers of adult household members.
 - The household must be provided with a name of the person at the school who can answer questions and provide assistance and no-cost telephone number.
 - If a household does not respond, schools must follow-up with that household at least once before that household is deemed non-responsive and meal benefits are ceased. See “Reducing the Burden of Verification.”
 - If a household selected for verification transfers out of the district before the information can be verified, a new application must be selected for verification.
5. Once responses have been received, re-determine the household’s benefits and send the prototype notification of results of verification letter to households. This letter is available at <http://www.opi.mt.gov/schoolfood/index.html>.

November 15

All verification activity must be completed by **November 15** (steps 1 through 5 above).

November 15 to December 15

Complete the Summary of Verification form and send it to School Nutrition Programs by **December 15, 2008** (keep copies of original applications, letters to households, and the Summary of Verification form on file at the school).

Verification Sample Methods

LEAs with **greater than 80%** response rate during the previous year may use **random** or **focused** sampling.

Random Sample

This method requires verification of 3 percent of approved applications on file as of October 1. This is the most common verification method used by LEAs with greater than 80% response rate.

1. Determine the sample size of 3 percent of all approved applications on file as of October eligible for verification (1.b. through 2).
 - **Round all fractions up** to whole numbers (ex: 73 applications x .03 = 2.16; the school must verify 3 applications). ***At least one application must be verified.***
2. Draw a random sample from among these applications. Ways to take a random sample:
 - Use a selection interval. Divide the total number of approved applications by the sample size to determine the selection interval. For example, if there are 160 applications and 5 is the sample size, divide 160 by 5 = 32. Randomly select every 32nd approved application until 5 applications are selected.
 - Ask someone in the office to randomly draw the required number of applications.
3. Continue to step 3 on previous page.

Focused Sample

This method requires verification of 1 percent of total approved applications on file as of October 1 selected from approved error-prone households (1.c. and 2) **plus** 0.5 percent of **applications** approved based on Food Stamp, FDPIR or TANF case numbers (1.b.). *This method is suitable for larger school districts.*

1. Take the 1 percent portion of the sample:
 - *Calculate* the sample size of 1 percent from **all** approved applications on file as of October 1 (include ALL applications except directly certified, homeless and administrative). Round fractions up to whole numbers.
 - *Draw* the sample from only the error-prone applications.
 - If there are more applications that meet the criteria than needed, select a random sample from those applications.
 - If there are not enough applications that meet the criteria, select applications that are closest to the income eligibility guidelines.
 - At least one income application must be verified if there are any such applications on file.
2. Take the 0.5 percent portion of the sample:
 - *Calculate* the sample size of one-half of one percent from the total number of applications approved based on Food Stamp, FDPIR, or TANF case number on file as of October 1 (1.b.). Round fractions up to whole numbers.
 - *Draw* the sample from the same applications (1.b.) using any method that is equitable and ensures that the same household is not selected each year.
 - At least one Food Stamp, FDPIR or TANF application must be verified if there are any such applications on file.
3. Add the number of applications in the 1 percent sample to the number of applications from the 0.5 percent sample. This is your total number of applications to be verified.
4. Continue to step 2 on previous page.

Definitions

Directly Certified

Students determined as eligible for free meals using data from Department of Public Health and Human Services letters and food stamp reports.

Error-Prone Applications

Applications within \$100 per month or \$1,200 per year of the Income Eligibility Guidelines.

Verification for Cause

The LEA has an obligation to verify all questionable applications (for cause). However, verification that is done “for cause” is **in addition to** and **should not be included** in the sample required for the formal verification process.